

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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CARLOS M. BUSH #246479

(Enter above the full name of the plaintiff
or plaintiffs in this action.)

vs.

Assist warden Dickerson,
Chief of Security Veal, Captain Ester,
SCO King,
C/O Campbell, C/O Harwell

(Enter above the full name of the defendant
or defendants in this action.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C., §1983

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes () No (✓)

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county): _____

3. Docket Number: _____

4. Name of judge to whom case was assigned: _____

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) _____

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

morgan county correctional complex

II. Place of Present Confinement: MCCX P.O. Box 2000, Wartburg, Tn. 37887

A. Is there a prisoner grievance procedure in the institution?

Yes ☒ No ☐

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes ☒ No ☐

C. If your answer is Yes:

1. What steps did you take? I Filed the Grievance and Followed the Appeal Process to the Commissioner
2. What was the result? Commissioner concurred with Assist Warden Dickerson

D. If your answer is No, explain why not: _____

III. Parties

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff CARLOS BUSH #246479

Address MCCX P.O. Box 2000, Wartburg, Tn 37887

(In item B below, place the full name of the defendant in the first blank, his official position in the second blank, and his and his place of employment in the third blank. Use Item C for the names, positions, and places of employment of an additional defendants.)

B. Defendant Dickerson, Assist Warden, Chief of Security is employed as Veal
at H.C.C.F P.O. Box 549, Whiteville, Tn. 38075
Hardeman County Correctional Facility

C. Additional Defendants: _____

Captain Ester, Sgt King, C/o Campbell, C/o Harwell

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Use as much space as you need. Attach extra sheet if necessary.

on 11-1-12 at approximately 8:00pm, I, Inmate Carlos Bush #246479 an inmate at the time at Hardeman County Correctional Facility housed in ~~MA~~ Segregation cell-104 was asleep on my Bunk when unbeknownst to me my securely locked cell door came open and 3 inmates entered my cell and beat me with a Blunt objects, causing deep and wide lacerations & on my face and Broken bones in my Facial structure. The officer was not present in this High Security Segregation Unit when the Assault occurred; my door was controlled by an electronic response unit

That Can only Be opened By an officer in the Control Booth. Our officer At the time was Unit Officer Campbell. She was not in or at her Assigned Post when the Assault occurred. The Control Booth Officer (The one who opens and Secures the Doors) is Control Booth Officer Harwell. She is the one who opened my Door so that this Assault could take place. Sergeant King, IS the Unit Sergeant Responsible For Ensuring that A officer Remains at there Assigned Position, For MA Segregated pod. Shift Supervisor Captain Ester, Responsibility is making Sure the P.C Segregation unit is Secure Against All Threats. Chief of Security, Veal, Responsibility is to make Sure all Doors are to Remain Secure and to maintain Security measures at Hardeman County Correctional Facility. Assist Warden, Dickerson of Hardeman County Correctional Facility. He is legally Responsible For the operation of the Facility and For the welfare, of all inmates in that Prison. Above names that Doesn't have First names Attached to them, will continue to Be called AS Such until Such time AS First names are Given.

I Swear Under Penalty of Perjury that the Fore Going is true Accurate.

Signed this, The 10th Day of October, 2013
State of Tennessee
County of Morgan.
Charles Bush #246479
Signature

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments.

Cite no cases or statutes.

Assist Warden, Dickerson - \$25,000, Neglect, Violation of
8th Amendment Rights, Chief of Security, Veal - \$25,000
Violation of 8th Amendment Right, Neglect.
Shift Captain, Ester - \$25,000 Violation of 8th
Amendment Rights Neglect, Unit Sgt, King - \$25,000
Violation of 8th Amendment Rights, Neglect.
Unit Officer, HARwell - \$25,000 Violation 8th Amendment
Rights, Neglect. Unit Officer, Campbell - \$25,000
violation 8th Amendment Rights, Neglect.
50,000 Pain & Suffering

VI. Jury Demand

I would like to have my case tried by a jury. Yes (✓) No ().

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of our information, knowledge, and belief.

Signed this 10th day of October, 20 13.

Charles M. Bush

(Signature of Plaintiff/Plaintiffs)